RUBIN DECLARATION EXHIBITS CONTINUED

Rubin Exhibit 81

To: "Joey Infortuno" <Joey@jibjab.net>
From: "Copyright Service" <copyright@youtube.com>
CC: gstrompolos@youtube.com, "Cameron Saless" <cameron@jibjab.net>, "Operations Team" <ops@jibjab.net>
BCC:
Sent Date:
Subject: Re: [#208473573] JibJab and YouTube_copyright miscommunication

---

Dear Joey,

JibJab Media Inc. has retracted its copyright claim with respect to the following videos:

http://www.youtube.com/watch?v=Olg1efSlvLg
http://www.youtube.com/watch?v=fk8egz_yXL0
http://www.youtube.com/watch?v=pKv6RcXa2UI
http://www.youtube.com/watch?v=MLQ928VhyxM
http://www.youtube.com/watch?v=3Q2EPKKVrqI
http://www.youtube.com/watch?v=3ThHrqlGdSk
http://www.youtube.com/watch?v=a_TL1CqgEJQ

This content has been restored and your account will not be penalized. For technical reasons, it may take a day for the videos to be available again.

Sincerely,

Harry
The YouTube Team

Original Message Follows:

From: "Joey Infortuno" <Joey@jibjab.net>
Subject: JibJab and YouTube_copyright miscommunication
Date: Fri, 19 Oct 2007 09:45:17 -0700

Hello,

My name is Joey Infortuno for JibJab Media and I worked with YouTube's George Strompolos to get our JibJab channel up and running. I have a bit of an embarrassing situation that I hope you can help us resolve.

Due to lack of internal communication, our very own Operations Department filed copyright complaints against the video content in our very own YouTube Channel (http://youtube.com/jibjab). I apologize for the mishap but given that these videos are in fact ours, is it possible reinstate them?

Matzah! - http://www.youtube.com/watch?v=Olg1efSlvLg <http://www.youtube.com/watch?v=Olg1efSlvLg>

Do I Creep You Out - http://www.youtube.com/watch?v=fk8egz_yXL0
<http://www.youtube.com/watch?v=fk8egz_yXL0>

Big Box Mart: http://www.youtube.com/watch?v=pKv6RcXa2UI
<http://www.youtube.com/watch?v=pKv6RcXa2UI>

Nuckin' Futs!: http://www.youtube.com/watch?v=MLQ928VhyxM
<http://www.youtube.com/watch?v=MLQ928VhyxM>

What We Call The News: http://www.youtube.com/watch?v=3Q2EPKKVrqI
<http://www.youtube.com/watch?v=3Q2EPKKVrqI>

2-0-5: http://www.youtube.com/watch?v=3ThHrqlGdSk
<http://www.youtube.com/watch?v=3ThHrqlGdSk>

Deck The Halls: http://www.youtube.com/watch?v=a_TL1CqgEJQ
<http://www.youtube.com/watch?v=a_TL1CqgEJQ>

Regards,

Joey Infortuno

joey@jibjab.net

Rubin Exhibit 82

To: <copyright@youtube.com>
From: <Bobby.Sherman@sonybmg.com>
CC:
BCC:
Sent Date: 2007-10-24 00:31:58 GMT
Subject: RE: [#209332208] FW: Video Removed: Copyright Infringement [Calvin Harris]

Thanks Harry, much appreciated!

-----Original Message-----
From: Copyright Service [mailto:copyright@youtube.com]
Sent: Tuesday, October 23, 2007 5:15 PM
To: Sherman, Bobby, BMG - Los Angeles
Cc: Sanzio, Nicole SONY BMG
Subject: Re: [#209332208] FW: Video Removed: Copyright Infringement [Calvin Harris]

Hi Bobby,

Thank you for the retraction. The material has been restored.

Sincerely,

Harry
The YouTube Team

Original Message Follows:

From: <Bobby.Sherman@sonybmg.com>
Subject: FW: Video Removed: Copyright Infringement [Calvin Harris]
Date: Tue, 23 Oct 2007 09:22:59 -0700

We did it yet again! We issued a take-down on a video that was living in one of our channels. Calvin Harris 'Merrymaking At My Place': http://www.youtube.com/watch?v=8jVCOumbXdU. Please reinstate the video in the "icreateddisco" channel www.youtube.com/icreateddisco.

Thanks!

Bobby Sherman

SONY BMG

From: Copyright Notice <no_reply@youtube.com>

Date: 22 October 2007 23:00:13 BDT

To: icreateddisco <calvinharristv@mac.com>

Subject: Video Removed: Copyright Infringement

YouTube | Broadcast Yourself(tm)

Dear Member:

This is to notify you that we have removed or disabled access to the following material as a result of a third-party notification by Sony BMG claiming that this material is infringing:

Calvin Harris 'Merrymaking At My Place':
http://www.youtube.com/watch?v=8jVCOumbXdU
<http://www.youtube.com/watch?v=8jVCOumbXdU>

Please Note: Repeat incidents of copyright infringement will result in the deletion of your account and all videos uploaded to that account. In order to avoid future strikes against your account, please delete any videos to which you do not own the rights, and refrain from uploading additional videos that infringe on the copyrights of others. For more information about YouTube's copyright policy, please read the Copyright Tips <http://www.youtube.com/t/howto_copyright> guide.

If you elect to send us a counter notice, please go to our Help Center <http://www.google.com/support/youtube/bin/answer.py?answer=58127> to access the instructions.

Be aware that there may be adverse legal consequences in your country if you make a false or bad faith allegation of copyright infringement by using this process.

Sincerely,
YouTube, Inc.

Copyright (c) 2007 YouTube, Inc.

Rubin Exhibit 83

To: <copyright@youtube.com>
From: <Bobby.Sherman@sonybmg.com>
CC:
BCC:
Sent Date: 2007-10-30 17:17:46 GMT
Subject: Avril Take Down

We took down another one of our own videos. This time it was the Avril Lavigne "I'm With You" video (http://www.youtube.com/watch?v=bW2LTnzD-vE) living in our "AvrilLavigne" channel (http://www.youtube.com/AvrilLavigne). Please reinstate the video and remove the strike from the account.

Sorry, and thank you!

Bobby Sherman
SONY BMG Global Digital Business
2100 Colorado Ave
Santa Monica, CA 90404

[redacted]
bobby.sherman@sonybmg.com
[redacted]

Rubin Exhibit 84

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION, LLC, Plaintiffs, vs. YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC., Defendants.	NO. 07-CV-2103
THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED, BOURNE CO., et al., on behalf of themselves and all others similarly situated, Plaintiffs, vs. YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC., Defendants.	NO. 07-CV-3582

VIDEOTAPED DEPOSITION OF MICHELENA HALLIE
NEW YORK, NEW YORK
THURSDAY, DECEMBER 10, 2009
JOB NO. 18264

are clips that we uploaded ourselves."

And it looks, at the very top, you are asking Cindy if she has the, "White List."

15:51:19

First of all, what is the White List?

A. I am assuming from this, that it is the list of clips that MTVN authorized to be uploaded.

15:51:41

Q. And how was the White List compiled?

A. People within MTVN were directed to send any user names or other identifying information to Cindy Morales and/or Warren Solow's group, depending on the time.

15:52:07

Q. And in your E-mail in the middle of the page that starts, "If there are commercials/trailers/promos," your instruction is, "they should be taken down unless they are from the addresses Cindy sent to you."

15:52:24

So was the policy, at that time, that clips that appeared to be

15:52:33

Rubin Exhibit 85

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC., COMEDY PARTNERS, COUNTRY MUSIC. TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION, LLC,	)	
Plaintiffs,	)	
vs.	)	NO. 07-CV-2103
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,	)	
Defendants.	)	
THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED, BOURNE CO., et al., on behalf of themselves and all others similarly situated,	)	
Plaintiffs,	)	
vs.	)	NO. 07-CV-3582
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,	)	
Defendants.	)	

VIDEOTAPED DEPOSITION OF WARREN SOLOW
NEW YORK, NEW YORK
JANUARY 14TH, 2010

JOB NO. 18509

A. I do not remember the -- this event, so I really can't speak to what was going through my head at the time.

Q. Did you have any discussions with anyone at Comedy Central prior to sending this takedown notice to determine whether the content identified in the link, in the e-mail of October 12, 2007 was authorized to be on collegehumor.com?

A. I have no recollection of such a conversation. I couldn't say whether it happened or not.

Q. Did you have a conversation with anyone at MTV on the same subject?

MS. KOHLMANN: Objection.

A. I have no recollection of this event.

Q. Before sending a takedown notice do you require that an analysis be conducted to determine that the content to be taken down is authorized by Viacom or any of its subsidiaries to be on the service at issue?

MS. KOHLMANN: Objection as to

form.

A. We take some steps to attempt to mitigate situations where we take our own content that maybe authorized down.

14:34:44 Q. What steps do you take to mitigate those circumstances, Mr. Solow?

A. We ask that those departments who are in the business of posting

14:34:59 clips to websites to provide information as to their activities.

Q. When did you first begin asking departments at Viacom who were engaged in uploading content to websites such

14:35:20 as YouTube to provide information about their uploading activities to you?

MS. KOHLMANN: Objection. You can answer.

A. I don't have a recollection.

14:35:38 Those mechanisms may have been in place before my involvement was in this regard.

Q. When did your involvement in this regard begin, Mr. Solow?

14:35:46 A. In early 2007.

Q. Prior to the date that Viacom sued YouTube?

A. Yes.

Q. What information do you ask that the Viacom departments involved in the upload of their content to services like YouTube provide to your department?

MS. KOHLMANN: Objection as to form.

A. There is not as much information as is available that will facilitate our ability to identify those clips.

Q. With specificity, Mr. Solow please identify the specific types of information you asked those types of departments to provide you with?

MS. KOHLMANN: Objection as to form.

A. Website URL is the most material information that we ask for.

Q. Do you ask for the user name of the account to which the content was uploaded?

A. That is often provided, that is

almost always provided. I have no recollection of ever asking, physically asking somebody to provide information to me. But I do know what information
14:37:21 I do get and user ID is generally a part of that.

Q. What other information do you usually get?

A. User ID, URL, website, that's
14:37:43 what comes to mind. Perhaps this is a non-comprehensive list, perhaps the asset from which it comes or that it's attached to.

Q. Do you ever receive or ask for
14:37:54 the IP address from which the content has been posted?

A. No.

Q. Why not?

A. I haven't identified a need for
14:38:23 that.

Q. Do you keep a record of the information that is provided to you from the departments at Viacom that upload their content to YouTube and
14:38:39 other services?

MS. KOHLMANN: Objection.

A. Pardon me. I do not, no.

Q. Is a record kept of that information?

14:38:48 A. Yes.

Q. Where is that record kept?

A. I'm not sure.

Q. How can you state with certainty that such a record is kept?

14:39:04 A. Because I've asked somebody to do it and I trust that they've done it.

Q. Who have you asked to do it?

A. Michael Housley.

Q. Do you believe it's important

14:39:32 that that list be comprehensive?

MS. KOHLMANN: Objection as to form.

A. I believe that it is important to endeavor to have a comprehensive

14:39:50 list.

Q. So you do believe it's important that that set of information is comprehensive about the activities of the departments at Viacom that uploaded

14:40:01 their content to use, for example,

right?

MS. KOHLMANN: Objection. Misstates the record. You can answer.

A. Importance is a subjective word but that certainly is information that I'd like to have.

Q. What value does that information provide to you in the execution of your responsibilities at Viacom?

14:40:17 A. It adds an increased level of precision.

Q. In what sense?

A. It helps mitigate the removal of clips that some parts of the

14:40:38 organization would prefer to stay in place.

Q. It prevents Viacom from mistakenly removing content that it itself has authorized to be on the

14:40:50 service. Isn't that right?

MS. KOHLMANN: Objection as to form.

A. Those are your words. I answered that using my words a moment

14:40:57 ago.

time. Isn't that right?

A. I believe that to be so.

Q. Is information related to that activity also provided to your

14:42:13 department?

MS. KOHLMANN: Objection as to form.

A. Information of that variety has been provided to my department.

14:42:21 Q. Do you also instruct Mr. Housley to maintain information related to that activity?

A. Yes.

Q. Have you ever heard the term,

14:43:14 Mr. Solow, white list?

A. Yes.

Q. What do you understand the term white list to mean?

A. In what context?

14:43:28 Q. In the context in which you heard it in your employment capacity at Viacom.

A. I've heard our approved outside counsel list referred to in that list,

14:43:47 preferred vendor lists, I've heard

lists of video content that we would like, that has been authorized for placement in various locations on the internet referred to in that regard also.

14:44:10

Q. Have you also heard lists of authorized user names from whom postings to websites such as YouTube should not be removed referred to as a white list?

14:44:25

MS. KOHLMANN: Objection as to form.

A. I've heard of -- not lists of user names but that user name -- user names have been a component of such white lists, yes.

14:44:39

Q. Is the information that Mr. Housley compiles, that we were just referring to a moment ago, referred to as a white list?

14:44:53

A. By some people.

Q. By you, Mr. Solow?

A. Generally not.

Q. Have you ever referred to that as a white list?

14:45:02

Rubin Exhibit 86

From: Deana Arizala
Sent: Wednesday, January 03, 2007 5:45 PM
To: Morales, Cindy
Cc: Michelena.hallie@mtvn.com; Courtney Nieman; Evelyn Espinosa; Mark M. Ishikawa
Subject: Approved links and user
Attachments: Approved Links and User.doc

Cindy,

Enclosed are the approved links and user and I had put together with the appropriate channel. Please let me know if you have any questions. Thanks.

Logo

Noah's Arc
http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendid=113996991
http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendid=94946165
http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendid=94945456
http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendid=94426519
http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendid=96584384
http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendid=94945771
http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendid=94945108

MTV

The Hills
www.myspace.com/thehillsonmtv

Run's House
www.myspace.com/runshousemtv

Meaty the Dog
www.myspace.com/meatythedog

24/7
www.myspace.com/mtvtwentyfourseven

Making the Band
www.myspace.com/makingthebandonmtv

Meet the Barkers
www.myspace.com/meetthebarkers

Yo Momma
www.myspace.com/therealyomomma

Moonman
www.myspace.com/mtvmoonman

Blowin' Up
www.myspace.com/blowinupmtv

HIGHLY CONFIDENTIAL

www.myspace.com/mtvblowinup

51

Flavor of Love

http://www.youtube.com/watch?v=uXnx5QxplRc
http://www.youtube.com/watch?v=ynJmXSht2jI
http://www.youtube.com/watch?v=ia_pl6rVg_k
http://www.youtube.com/watch?v=BRbM2qfD08U
http://www.youtube.com/watch?v=QQxyhtYk3CI
http://www.youtube.com/watch?v=kihSHIoW-Tg
http://www.youtube.com/watch?v=4CtHP6Ut-zM
http://www.youtube.com/watch?v=hFoCygnKOaA
http://www.youtube.com/watch?v=pAkp_Hr5rN4
http://www.youtube.com/watch?v=yZ1SEDh_JPc
http://www.youtube.com/watch?v=PjiZqOOAipw

VH1

Freestyle59
http://www.youtube.com/watch?v=zlbL-zhMK8k
http://www.youtube.com/watch?v=zgBl1BKpwjQ

Totally Awesome
http://www.youtube.com/watch?v=qvUzUOSbs9Y
http://www.youtube.com/watch?v=M-G_NQZb1lI
http://www.youtube.com/watch?v=_5vjL2stAz0
http://www.youtube.com/watch?v=jFoQNdwaGys
http://www.youtube.com/watch?v=3saVMo96328
http://www.youtube.com/watch?v=xPfTPn-eGKk

Wendy William Experience
http://www.youtube.com/watch?v=qVVGT7Rfrvk

New York Hospitality
http://www.youtube.com/watch?v=Dy9lYAELqlE

Hogan Knows Best
http://www.youtube.com/watch?v=x1ycbHjePjM

Spike TV

http://www.youtube.com/spiketv

HIGHLY CONFIDENTIAL

TV Land

Mr. T
http://www.youtube.com/watch?v=fYOjF4RtBPU
http://www.youtube.com/watch?v=u_bRnbx_osM
http://www.youtube.com/watch?v=OXLA8bzK0oo
http://www.youtube.com/watch?v=lBdbE9dtFnQ
http://www.youtube.com/watch?v=xx5p_wv_izo
http://www.youtube.com/watch?v=76cCpNtOLJM
http://www.youtube.com/watch?v=DEZIhn9TKB0
http://www.youtube.com/watch?v=uA_JxuelTtA
http://www.youtube.com/watch?v=U921abH7jIk
http://www.youtube.com/watch?v=Eisa5AZ20W0
http://www.youtube.com/watch?v=iBMibtjDJp0
http://www.youtube.com/watch?v=ZaeMJ7oMf94

Username	**Channel**
vh1staff	VH1
spiketv	SpikeTV
reaction2006	51
Wiredset	
Isitfridayyet	MTV
Snackboard	
Damonjohnson	MTV
jerseymouth1	MTV

Best Regards,
Deana Arizala

Deana Arizala
Client Services Manager. BayTSP, Inc
408.341.2365 (direct)
408.341.2300 (voice)
408.341.2399 (fax)

Rubin Exhibit 87

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES COPRORATION, and BLACK ENTERTAINMENT TELEVISION LLC, Plaintiffs, v. YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE INC., Defendants.	Case No. 1:07-CV-2103-LLS (Related Case No. 1:07-cv-03582 (LLS))

PLAINTIFFS VIACOM INTERNATIONAL INC. ET AL.'S RESPONSES TO DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSION

Plaintiffs Viacom International Inc. et al. ("Viacom") respond to Defendants First Set of Requests for Admission ("RFAs") as follows.

GENERAL OBJECTIONS

The following General Objections to the RFAs are incorporated by reference into each of Viacom's responses below.

1. Viacom objects to each RFA to the extent it seeks to elicit information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.

2. Viacom objects to each RFA to the extent it seeks to elicit Viacom's opinion as opposed to facts.

3. Viacom objects to each RFA to the extent it seeks to impose obligations or requirements beyond those imposed by the Federal Rules of Civil Procedure, the Local Rules of the Southern District of New York, or the applicable standing orders and orders of this Court.

4. Viacom objects to each RFA to the extent it sets forth compound, conjunctive, or disjunctive statements.

5. Viacom objects to each RFA to the extent it is unduly burdensome and seeks information not relevant to the above-captioned litigation.

6. Viacom objects to the definitions of "Viacom," "You," and "Your" to the extent that they are vague, ambiguous, overly broad, and unduly burdensome.

7. Viacom objects to the definition of "Accused Clip" as compound, vague, and ambiguous. To the extent that it includes clips that are not the subject of allegations of infringement in this litigation, Viacom further objects to that definition as overly broad, unduly burdensome, and not reasonably related to the claims or defenses at issue. Hereafter, Viacom uses the term "Clips In Suit" to refer to the clips that are actually at issue in this litigation, as identified in Viacom's Works In Suit Disclosure of October 15, 2009.

8. Viacom objects to the use of the phrase "DMCA Takedown Notice" as vague, ambiguous, and calling for a legal conclusion. For the purposes of these Responses, Viacom construes that phrase to refer to any notice alleging copyright infringement and requesting the removal of material.

9. Viacom objects to the use of the phrase "at all relevant times" as vague and ambiguous.

10. In objecting to Defendants' First Set of Requests for Admission, Viacom does not in any way waive or intend to waive but, rather, intends to preserve and are preserving:

a. all objections as to competency, relevancy, materiality, privilege and admissibility of evidence for any purpose of any information or document, or the subject matter thereof, in the trial of this or any other action or subsequent proceedings;

b. the right to object to the use of any information or document, or the subject matter thereof, in the trial of this or any other action or subsequent proceedings;

c. the right to elicit appropriate evidence, beyond the responses themselves, regarding the subjects referred to in or in response to any RFA; and

d. the right at any time to correct, supplement, or clarify any of the objections or responses.

11. These general objections are incorporated by reference into each of Viacom's Responses set forth below.

RESPONSES AND OBJECTIONS TO SPECIFIC REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that at all relevant times YouTube was a "service provider" as that term is used in 17 U.S.C. § 512(k)(1)(B).

Admit that YouTube is a "service provider" as that term is used in 17 U.S.C. § 512(k)(1)(B). For purposes of clarity, Viacom denies that YouTube is or ever has been a "service provider" as that term is used in 17 U.S.C. § 512(k)(1)(A).

REQUEST FOR ADMISSION NO. 2:

Admit that at all relevant times, YouTube stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(1).

Deny.

REQUEST FOR ADMISSION NO. 3:

Admit that the material You allege to infringe Your copyrights in this case was stored on the youtube.com service "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(1).

Deny.

REQUEST FOR ADMISSION NO. 4:

Admit that all of Your copyright infringement claims in this action allege infringement of copyrights "by reason of the storage at the direction of a user" of material that resides on a system or network controlled or operated by or for YouTube, as set forth in 17 U.S.C. § 512(c)(l).

Deny.

REQUEST FOR ADMISSION NO. 5:

Admit that at all relevant times, YouTube had "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C. § 512(c)(2).

Deny.

REQUEST FOR ADMISSION NO. 6:

Admit that on every occasion that You sent YouTube a DMCA Takedown Notice relating to an Accused Clip, YouTube responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the material claimed to be infringing.

Deny.

REQUEST FOR ADMISSION NO. 7:

Admit that on every occasion that You sent YouTube a DMCA Takedown Notice relating to an Accused Clip, YouTube responded within seventy-two business hours to remove or disable access to the material claimed to be infringing.

Deny.

REQUEST FOR ADMISSION NO. 8:

Admit that for all of the Accused Clips, prior to receiving a DMCA Takedown Notice from You identifying those specific clips, YouTube did not have "actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(c)(1)(A)(i).

Deny.

REQUEST FOR ADMISSION NO. 9:

Admit that on no occasion did YouTube fail to expeditiously remove or disable access to an Accused Clip to the extent YouTube became aware of facts or circumstances from which infringing activity was apparent, as described in 17 U.S.C. § 512(c)(1)(A)(ii).

Deny.

REQUEST FOR ADMISSION NO. 10:

Admit that YouTube lacked the right and ability to control the infringing activity alleged by You in this case, as described in 17 U.S.C. § 512(c)(l)(B).

Deny.

REQUEST FOR ADMISSION NO. 11:

Admit that YouTube did not receive a financial benefit directly attributable to the infringing activity alleged by You in this case, as described in 17 U.S.C. § 512(c)(1)(B).

Deny.

REQUEST FOR ADMISSION NO. 12:

Admit that at all relevant times, access to and use of the youtube.com service was provided to users by YouTube free and without charge.

Viacom objects to this RFA on the ground that the terms "access to," "use of," and "users" are vague, ambiguous, and potentially cover a broad range of activities. Subject to and without waiving that objection, Viacom admits that users can watch videos on YouTube free and without charge, but denies this RFA in all other respects.

REQUEST FOR ADMISSION NO. 13:

Admit that at all relevant times YouTube had adopted and reasonably implemented, and informed its subscribers and account holders of, a policy that provides for the termination in appropriate circumstances of subscribers and account holders of YouTube who were repeat infringers, as described in 17 U.S.C. § 512(i)(1)(A).

Deny.

REQUEST FOR ADMISSION NO. 14:

Admit that at no time relevant to this lawsuit have there been any "standard technical measures" in existence as that term is defined in 17 U.S.C. §§ 512(i)(l)(B) and 512(i)(2).

Deny.

REQUEST FOR ADMISSION NO. 15:

Admit that You do not claim in this case that YouTube failed to comply with 17 U.S.C. §§ 512(i)(1)(B) (*i.e.*, YouTube accommodates and not interfere with "standard technical measures" to the extent any exist).

Deny.

REQUEST FOR ADMISSION NO. 16:

Admit that You have uploaded videos to the youtube.com service.

Viacom denies that it uploaded to youtube.com any of the Clips In Suit. Viacom admits that it uploaded a small number of trailers and other promotional videos that are not at issue in this litigation and that such uploads were generally performed with Defendants' knowledge and encouragement.

REQUEST FOR ADMISSION NO. 17:

Admit that You have uploaded videos to the youtube.com service for marketing and promotional purposes.

Viacom denies that it uploaded to youtube.com any of the Clips in Suit for any purpose, including marketing and promotional purposes. Viacom admits that it uploaded a small number of trailers and other promotional videos that are not at issue in this litigation and that such uploads were generally performed with Defendants' knowledge and encouragement.

REQUEST FOR ADMISSION NO. 18:

Admit that, with respect to some videos uploaded or authorized to be uploaded by You to the youtube.com service, You intentionally concealed the fact that the uploading of the videos was done by You or at Your direction.

Deny.

REQUEST FOR ADMISSION NO. 19:

Admit that one or more of the Accused Clips were uploaded by You to the youtube.com service.

Viacom denies this RFA as to the Clips In Suit. Viacom further denies that it uploaded any of the clips listed by URL in Attachment A.

REQUEST FOR ADMISSION NO. 20:

Admit that the presence on the youtube.com website of videos embodying the Works in Suit can have the effect of increasing consumer demand for those works.

Viacom objects to this RFA on the grounds that it is vague, ambiguous, and an incomplete hypothetical. Subject to that objection, deny.

REQUEST FOR ADMISSION NO. 21:

Individually for each Accused Clip, admit that the Accused Clip was uploaded to YouTube by You or by a third party with Your authorization.

Viacom denies this RFA as to the Clips In Suit. Viacom further denies that it uploaded any of the clips listed by URL in Attachment A.

REQUEST FOR ADMISSION NO. 22:

Admit that You created the account "Paraccount" on the YouTube service and used it to upload Your copyrighted material to YouTube.

Admit.

REQUEST FOR ADMISSION NO. 23:

Admit that You created the account "VH1 staff" on the YouTube service and used it to upload Your copyrighted material to YouTube.

Admit.

REQUEST FOR ADMISSION NO. 24:

Admit that You created the account "ParamountVantage" on the YouTube service and used it to upload Your copyrighted material to YouTube.

Admit.

REQUEST FOR ADMISSION NO. 25:

Admit that You created the account "MTV2" on the YouTube service and used it to upload Your copyrighted material to YouTube.

Deny as to creation, admit as to use.

REQUEST FOR ADMISSION NO. 26:

Admit that You created the account "SpikeTV" on the YouTube service and used it to upload Your copyrighted material to YouTube.

Admit.

REQUEST FOR ADMISSION NO. 27:

Admit that You created the account "ParamountClassics" on the YouTube service and used it to upload Your copyrighted material to YouTube.

Admit.

REQUEST FOR ADMISSION NO. 28:

Admit that You created the account "MTV2AllThatRocks" on the YouTube service and used it to upload Your copyrighted material to YouTube.

Admit.

REQUEST FOR ADMISSION NO. 29:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Thatsfunny".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 30:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Thatisalsofunny".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 31:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Thatsnotfunny".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 32:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "BroadwayJoe".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 33:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "BroadwayJoe415".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 34:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "PinkStrawberry".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 35:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "PinkStrawberry1".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 36:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "ParkMyVibe".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 37:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "FiveChemical".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 38:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "FunFunFunnyVideo".

Deny.

REQUEST FOR ADMISSION NO. 39:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "strangewildernessuk".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 40:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "cuongnyc".

Deny.

REQUEST FOR ADMISSION NO. 41:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "skippynyc".

Deny.

REQUEST FOR ADMISSION NO. 42:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "mosjef73".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 43:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "keithhn".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 44:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "MysticalGirl8".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 45:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "veehonerockz".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 46:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "qpittman".

Deny.

REQUEST FOR ADMISSION NO. 47:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "inmundo".

Deny.

REQUEST FOR ADMISSION NO. 48:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "mtvnewsinterns".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 49:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "MTVSneakAttack".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 50:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "UTubeVJ".

Deny.

REQUEST FOR ADMISSION NO. 51:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "bestclips".

Deny.

REQUEST FOR ADMISSION NO. 52:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "SpacePrince72".

Deny.

REQUEST FOR ADMISSION NO. 53:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "kdolak42".

Deny.

REQUEST FOR ADMISSION NO. 54:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "thinkmtv".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 55:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "panelistclips".

Deny.

REQUEST FOR ADMISSION NO. 56:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "NMarketing".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 57:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "bestweekever".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 58:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "beheard".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 59:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "HotRodMovie".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSI0N NO. 60:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "PeachesLarue".

Deny.

REQUEST FOR ADMISSI0N NO. 61:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Demansr".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 62:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Reaction2006".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 63:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Wiredset".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 64:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Isitfridayyet".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 65:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "snackboard".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 66:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "gossipgirl40".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 67:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "fanscapevideos".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 68:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "Damonjohnson".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 69:

Admit that You authorized Your copyrighted material to be uploaded to Y O1.lrube under the account name "jerseymouth1".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 70:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "BadBoyRecords".

Deny.

REQUEST FOR ADMISSION NO.71:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "blacktreemedia".

Deny.

REQUEST FOR ADMISSION NO. 72:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "bpfrecords".

Deny.

REQUEST FOR ADMISSION NO. 73:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "CBS".

Deny.

REQUEST FOR ADMISSION NO. 74:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "freeforlife112".

Deny.

REQUEST FOR ADMISSION NO. 75:

Admit that You authorized your copyrighted material to be uploaded to YouTube under the account name "FutureWorld77".

Deny.

REQUEST FOR ADMISSION NO. 76:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "irenemariemodels".

Deny.

REQUEST FOR ADMISSION NO. 77:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "ladyfragment".

Deny.

REQUEST FOR ADMISSION NO. 78:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "laurenceegibbs".

Deny.

REQUEST FOR ADMISSION NO. 79:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "LiberalViewer".

Deny.

REQUEST FOR ADMISSION NO. 80:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "ParamountPictures".

Deny.

REQUEST FOR ADMISSION NO. 81:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "ParamountGermany".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 82:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "ParamountViacom".

Deny.

REQUEST FOR ADMISSION NO. 83:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "ParamountVantage".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 84:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "dreamworksfansite".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 85:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "waytblue".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 86:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "HotRodMovie".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 87:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "tastefullymine".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 88:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "waytobluefrance".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 89:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "BrienTA".

Deny.

REQUEST FOR ADMISSION NO. 90:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "eibrandedcontent".

Deny.

REQUEST FOR ADMISSION NO. 91:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "hostiltakeoverbank".

Deny.

REQUEST FOR ADMISSION NO. 92:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "StrangersWCandyMovie".

Deny.

REQUEST FOR ADMISSION NO. 93:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "powermadeak47dotcom".

Deny.

REQUEST FOR ADMISSION NO. 94:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "powmadeak47".

Deny.

REQUEST FOR ADMISSION NO. 95:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "reno9112miami".

Deny.

REQUEST FOR ADMISSION NO. 96:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "shishka".

Deny.

REQUEST FOR ADMISSION NO. 97:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "themoviemonkey".

Deny.

REQUEST FOR ADMISSION NO. 98:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "thesparksfly".

Deny.

REQUEST FOR ADMISSION NO. 99:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "TNAwrestling".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 100:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "txcany".

Deny.

REQUEST FOR ADMISSION NO.101:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "victorweb".

Deny.

REQUEST FOR ADMISSION NO. 102:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "vlogging".

Deny.

REQUEST FOR ADMISSION NO. 103:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "schnebley".

Deny.

REQUEST FOR ADMISSION NO. 104:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "universalmusicgroup".

Deny.

REQUEST FOR ADMISSION NO. 105:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "bullrunvideo".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 106:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "bravenewfilms".

Deny.

REQUEST FOR ADMISSION NO. 107:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "chu2007".

Viacom admits that it or its authorized agents uploaded a specific clip or clips containing its copyrighted material to YouTube to this account, but otherwise denies.

REQUEST FOR ADMISSION NO. 108:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "livetorhyme88".

Deny.

REQUEST FOR ADMISSION NO. 109:

Admit that You authorized Your copyrighted material to be uploaded to YouTube under the account name "globe427".

Deny.

REQUEST FOR ADMISSION NO. 110:

Admit that You agreed to YouTube's Terms of Service when You created accounts on the YouTube service.

Viacom objects that this RFA is vague and ambiguous with respect to the phrase "Terms of Service." Subject to and without waiving those objections, Viacom admits that it agreed to YouTube's Terms of Service in effect at the time when it created accounts on the YouTube service only with respect to videos uploaded by Viacom or its authorized agents to those accounts and insofar as the Terms of Service are legally enforceable and do not conflict with laws of intellectual property. Deny in all other respects.

REQUEST FOR ADMISSION NO. 111:

Admit that You expressly licensed YouTube under Your copyrights pertaining to all videos that You or Your agents uploaded to YouTube.

Viacom admits that it expressly granted a limited, revocable license only with respect to videos actually uploaded by Viacom or its authorized agents, which do not include any Clips In Suit. Deny in all other respects.

REQUEST FOR ADMISSION NO. 112:

Admit that prior to October 2006, You authorized all clips of the "The Daily Show" and the "Colbert Report" that were less than 5 minutes in length to remain on the YouTube service.

Deny.

REQUEST FOR ADMISSION NO. 113:

Admit that in October 2006, You authorized all clips of the "The Daily Show" and the "Colbert Report" that were less than 3 minutes in length to remain on the YouTube service.

Deny.

REQUEST FOR ADMISSION NO. 114:

Admit that in November 2006, You authorized all clips of the "The Daily Show" and the "Colbert Report" that were less than 2.5 minutes in length to remain on the YouTube service.

Deny.

REQUEST FOR ADMISSION NO. 115:

Individually for each Accused Clip, admit that You did not send a DMCA Takedown Notice to YouTube within one week of becoming aware of that clip's presence on YouTube.

Viacom objects to this RFA on the ground that it purports to constitute over 63,000 separate Requests for Admission, one for each Clip In Suit. Viacom further objects to this RFA on the ground that, for the majority of Clips In Suit, Defendants have no good-faith basis for requesting an admission that Viacom did not send a takedown notice within one week of becoming aware of the clip's presence on YouTube. Subject to and without waiving those objections, Viacom denies that for most of the Clips In Suit it did not send a takedown notice to YouTube within one week of becoming aware of that clip's presence on YouTube.

REQUEST FOR ADMISSION NO. 116:

Individually for each Accused Clip, admit that You did not send a DMCA Takedown Notice to YouTube within one month of becoming aware of that clip's presence on YouTube.

Viacom objects to this RFA on the ground that it purports to constitute over 63,000 separate Requests for Admission, one for each Clip In Suit. Viacom further objects to this RFA on the ground that, for the majority of Clips In Suit, Defendants have no good-faith basis for requesting an admission that Viacom did not send a takedown notice within one month of becoming aware of the clip's presence on YouTube. Subject to and without waiving those objections, Viacom denies that for most of the Clips In Suit it did not send a takedown notice to YouTube within one month of becoming aware of that clip's presence on YouTube.

REQUEST FOR ADMISSION NO. 117:

Individually for each Accused Clip, admit that You did not send a DMCA Takedown Notice to YouTube within two months of becoming aware or that clip's presence on YouTube.

Viacom objects to this RFA on the ground that it purports to constitute over 63,000 separate Requests for Admission, one for each Clip In Suit. Viacom further objects to this RFA on the ground that, for the majority of Clips In Suit, Defendants have no good-faith basis for requesting admissions that Viacom did not send a takedown notice within two months of becoming aware of the clip's presence on YouTube. Subject to and without waiving those objections, Viacom denies that for most of the Clips In Suit it did not send a takedown notice to YouTube within two months of becoming aware of that clip's presence on YouTube.

REQUEST FOR ADMISSION NO. 118:

Admit that as of July 1, 2006 Atom had "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C. § 512(c)(2).

Admit.

REQUEST FOR ADMISSION NO. 119:

Admit that as of July 1, 2006 Atom had provided to the Copyright Office substantially the information set forth in 17 U.S.C. § 512(c)(2)(A)-(B) for its designated agent to received notifications of claimed infringement.

Admit.

REQUEST FOR ADMISSION NO. 120:

Admit that as of July 1, 2006 the Register of Copyrights' directory of agents designated to receive notifications for claimed infringement included an agent for Atom designated by you.

Admit.

REQUEST FOR ADMISSION NO. 121:

Admit that as of July 1, 2006 Atom had stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(1).

Viacom objects to this RFA on the ground that it is vague with respect to the scope of the activity referenced. Subject to and without waiving that objection, deny.

REQUEST FOR ADMISSION NO. 122:

Admit that as of July 1, 2006 Atom was a "service provider" as defined in 17 U.S.C. § 512(k)(1)(B).

Admit.

REQUEST FOR ADMISSION NO. 123:

Admit that as of July 1, 2006 Atom had received DMCA Takedown Notices with respect to material posted on Atom.

Viacom admits that, as of August 9, 2006, Atom had received one takedown notice for alleged copyright infringement with regard to material posted on Atom.

REQUEST FOR ADMISSION NO. 124:

Admit that as of July 1, 2006, on every occasion that Atom had received a DMCA Takedown Notice, it responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the allegedly infringing material.

Admit.

REQUEST FOR ADMISSION NO. 125:

Admit that as of July 1, 2006, prior to receiving a DMCA Takedown Notice concerning user-uploaded material on Atom, Atom did "not have actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(c)(1)(A)(i).

Admit.

REQUEST FOR ADMISSION NO. 126:

Admit that as of July 1, 2006, prior to receiving a DMCA Takedown Notice concerning user-uploaded material posted on Atom, Atom was not aware of facts or circumstances from which infringing activity was apparent, as described in 17 U.S.C. § 512(c)(1)(A)(ii).

Admit.

REQUEST FOR ADMISSION NO. 127:

Admit that as of July 1, 2006, with respect to user-uploaded material posted on Atom for which Atom had received a DMCA Takedown Notice, Atom did not have the right and ability to control the infringing activity, as described in 17 U.S.C. § 512(c)(1)(B).

Deny.

REQUEST FOR ADMISSION NO. 128:

Admit that as of July 1, 2006, with respect to user-uploaded material posted on Atom for which Atom has received a DMCA Takedown Notice, Atom did not receive a

financial benefit directly attributable to the infringing activity, as described in 17 U.S.C. § 512(c)(l)(B).

Viacom does not have enough information to determine whether alleged infringing clips on Atom were a draw for users, and therefore does not have information sufficient to admit or deny.

REQUEST FOR ADMISSION NO. 129:

Admit that as of July 1, 2006, Atom had adopted and reasonably implemented, and informed subscribers and account holders of Atom of, a policy that provided for the termination in appropriate circumstances of its subscribers and account holders who were repeat infringers, as described in 17 U.S.C. § 512(1)(1)(A).

Admit.

REQUEST FOR ADMISSION NO. 130:

Admit that as of July 1, 2006, Atom accommodated and did not interfere with "standard technical measures" as defined in 17 U .S.C. §§ 512(i)(l)(8) and 512(i)(2).

Admit.

REQUEST FOR ADMISSION NO. 131:

Admit that as of November 1, 2006 Atom had "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C, § 512(c)(2).

Admit.

REQUEST FOR ADMISSION NO. 132:

Admit that as of November 1, 2006 Atom had provided to the Copyright Office substantially the information set forth in 17 U.S.C. § 512(c)(2)(A)-(B) for its designated agent to received notifications of claimed infringement.

Admit.

REQUEST FOR ADMISSION NO. 133:

Admit that as of November 1, 2006 the Register of Copyrights' directory of agents designated to receive notifications for claimed infringement included an agent for Atom designated by you.

Admit.

REQUEST FOR ADMISSION NO. 134:

Admit that as of November 1, 2006 Atom had stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(I).

Viacom objects to this RFA on the ground that it is vague with respect to the scope of the activity referenced. Subject to and without waiving that objection, deny.

REQUEST FOR ADMISSION NO. 135:

Admit that as of November 1, 2006 Atom was a "service provider" as defined in 17 U.S.C. § 512(k)(l)(B).

Admit.

REQUEST FOR ADMISSION NO. 136:

Admit that as of November 1, 2006 Atom had received DMCA Takedown Notices with respect to material posted on Atom.

Viacom admits that, as of November 1, 2006, Atom had received ten or fewer takedown notices for alleged copyright infringement with regard to material posted on Atom.

REQUEST FOR ADMISSION NO. 137:

Admit that as of November 1, 2006, on every occasion that Atom had received a DMCA Takedown Notice, it responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the allegedly infringing material.

Admit.

REQUEST FOR ADMISSION NO. 138:

Admit that as of November 1, 2006, prior to receiving a DMCA Takedown Notice concerning user-uploaded material on Atom, Atom did "not have actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(c)(1)(A)(i).

Admit.

REQUEST FOR ADMISSION NO. 139:

Admit that as of November 1, 2006, prior to receiving a DMCA Takedown Notice concerning user-uploaded material posted on Atom, Atom was not aware of facts or circumstances from which infringing activity was apparent, as described in 17 U.S.C. § 512(c)(1)(A)(ii).

Admit.

REQUEST FOR ADMISSION NO. 140:

Admit that as of November 1, 2006, with respect to user-uploaded material posted on Atom for which Atom had received a DMCA Takedown Notice, Atom did not have the right and ability to control the infringing activity, as described in 17 U.S.C. § 512(e)(l)(B).

Deny.

REQUEST FOR ADMISSION NO. 141:

Admit that as of November 1, 2006, with respect to user-uploaded material posted on Atom for which Atom has received a DMCA Takedown Notice, Atom did not receive a financial benefit directly attributable to the infringing activity, as described in 17 U.S.C. § 512(c)(1)(B).

Viacom does not have enough information to determine whether alleged infringing clips on Atom were a draw for users, and therefore does not have information sufficient to admit or deny.

REQUEST FOR ADMISSION NO. 142:

Admit that as of November 1, 2006, Atom had adopted and reasonably implemented, and informed subscribers and account holders of Atom of, a policy that provided for the termination in appropriate circumstances of its subscribers and account holders who were repeat infringers, as described in 17 U.S.C. § 5l2(i)(1)(A).

Admit.

REQUEST FOR ADMISSION NO. 143:

Admit that as of November 1, 2006, Atom accommodated and did not interfere with "standard technical measures" as defined in 17 U.S.C. §§ 512(i)(l)(B) and 512(i)(2).

Admit.

REQUEST FOR ADMISSION NO. 144:

Admit that as of March 13, 2007 Atom had "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C. § 512(c)(2).

Admit.

REQUEST FOR ADMISSION NO. 145:

Admit that as of March 13, 2007 Atom had provided to the Copyright Office substantially the information set forth in 17 U.S.C. § 512(c)(2)(A)-(B) for its designated agent to received notifications of claimed infringement.

Admit.

REQUEST FOR ADMISSION NO. 146:

Admit that as of March 13, 2007 the Register of Copyrights' directory of agents designated to receive notifications for claimed infringement included an agent for Atom designated by you.

Admit.

REQUEST FOR ADMISSION NO. 147:

Admit that as of March 13, 2007 Atom had stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(l).

Viacom objects to this RFA on the ground that it is vague with respect to the scope of the activity referenced. Subject to and without waiving that objection, deny.

REQUEST FOR ADMISSION NO. 148:

Admit that as of March 13, 2007 Atom was a "service provider" as defined in 17 U.S.C. § 512(k)(1)(B).

Admit.

REQUEST FOR ADMISSION NO. 149:

Admit that as of March 13, 2007 Atom had received DMCA Takedown Notices with respect to material posted on Atom.

Viacom admits that, as of March 13, 2007, Atom had received ten or fewer takedown notices for alleged copyright infringement with regard to material posted on Atom.

REQUEST FOR ADMISSION NO. 150:

Admit that as of March 13, 2007, on every occasion that Atom had received a DMCA Takedown Notice, it responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the allegedly infringing material.

Admit.

REQUEST FOR ADMISSION NO. 151:

Admit that as of March 13, 2007, prior to receiving a DMCA Takedown Notice concerning user-uploaded material on Atom, Atom did "not have actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(e)(1)(A)(i).

Admit.

REQUEST FOR ADMISSION NO. 152:

Admit that as of March 13, 2007, prior to receiving a DMCA Takedown Notice concerning user-uploaded material posted on Atom, Atom was not aware of facts or circumstances from which infringing activity was apparent, as described in 17 U .S.C. § 512(c)(1)(A)(ii).

Admit.

REQUEST FOR ADMISSION NO. 153:

Admit that as of March 13, 2007, with respect to user-uploaded material posted on Atom for which Atom had received a DMCA Takedown Notice, Atom did not have the right and ability to control the infringing activity, as described in 17 U.S.C. § 512(c)(l)(8).

Deny.

REQUEST FOR ADMISSION NO. 154:

Admit that as of March 13, 2007, with respect to user-uploaded material posted on Atom for which Atom has received a DMCA Takedown Notice, Atom did not receive a financial benefit directly attributable to the infringing activity, as described in 17 U.S.C. § 512(c)(l)(8).

Viacom does not have enough information to determine whether alleged infringing clips on Atom were a draw for users, and therefore does not have information sufficient to admit or deny.

REQUEST FOR ADMISSION NO. 155:

Admit that as of March 13, 2007, Atom had adopted and reasonably implemented, and informed subscribers and account holders of Atom of, a policy that provided for the termination in appropriate circumstances of its subscribers and account holders who were repeat infringers, as described in 17 U.S.C. § 512(i)(1)(A).

Admit.

REQUEST FOR ADMISSION NO. 156:

Admit that as of March 13, 2007, Atom accommodated and did not interfere with "standard technical measures" as defined in 17 U.S.C. §§ 512(i)(1)(B) and 512(i)(2).

Admit.

REQUEST FOR ADMISSION NO. 157:

Admit that as of July 1, 2007 Atom had "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C. § 512(c)(2).

Admit.

REQUEST FOR ADMISSION NO. 158:

Admit that as of July 1, 2007 Atom had provided to the Copyright Office substantially the information set forth in 17 U.S.C. § 512(c)(2)(A)-(B) for its designated agent to received notifications of claimed infringement.

Admit.

REQUEST FOR ADMISSION NO. 159:

Admit that as of July 1, 2007 the Register of Copyrights' directory of agents designated to receive notifications for claimed infringement included an agent for Atom designated by you.

Admit.

REQUEST FOR ADMISSION NO. 160:

Admit that as of July 1, 2007 Atom had stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(1).

Viacom objects to this RFA on the ground that it is vague with respect to the scope of the activity referenced. Subject to and without waiving that objection, deny.

REQUEST FOR ADMISSION NO. 161:

Admit that as of July 1, 2007 Atom was a "service provider" as defined in 17 U.S.C. § 512(k)(1)(B).

Admit.

REQUEST FOR ADMISSION NO. 162:

Admit that as of July 1, 2007 Atom had received DMCA Takedown Notices with respect to material posted on Atom.

Viacom admits that, as of July 1, 2007, Atom received ten or fewer takedown notices for alleged copyright infringement with regard to material posted on Atom's user-generated video websites.

REQUEST FOR ADMISSION NO. 163:

Admit that as of July 1, 2007, on every occasion that Atom had received a DMCA Takedown Notice, it responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the allegedly infringing material.

Admit.

REQUEST FOR ADMISSION NO. 164:

Admit that as of July 1, 2007, prior to receiving a DMCA Takedown Notice concerning user-uploaded material on Atom, Atom did "not have actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(c)(1)(A)(i).

Admit.

REQUEST FOR ADMISSION NO. 165:

Admit that as of July 1, 2007, prior to receiving a DMCA Takedown Notice concerning user-uploaded material posted on Atom, Atom was not aware of facts or

circumstances from which infringing activity was apparent, as described in 17 U.S.C. § 512(e)(1)(A)(ii).

Admit.

REQUEST FOR ADMISSION NO. 166:

Admit that as of July 1, 2007, with respect to user-uploaded material posted on Atom for which Atom had received a DMCA Takedown Notice, Atom did not have the right and ability to control the infringing activity, as described in 17 U.S.C. § 512(c)(1)(B).

Deny.

REQUEST FOR ADMISSION NO. 167:

Admit that as of July 1, 2007, with respect to user-uploaded material posted on Atom for which Atom has received a DMCA Takedown Notice, Atom did not receive a financial benefit directly attributable to the infringing activity, as described in 17 U.S.C. § 512(c)(1)(B).

Viacom does not have enough information to determine whether alleged infringing clips on Atom were a draw for users, and therefore does not have information sufficient to admit or deny.

REQUEST FOR ADMISSION NO. 168:

Admit that as of July 1, 2007, Atom had adopted and reasonably implemented, and informed subscribers and account holders of Atom of, a policy that provided for the termination in appropriate circumstances of its subscribers and account holders who were repeat infringers, as described in 17 U.S.C. § 512(i)(1)(A).

Admit.

REQUEST FOR ADMISSION NO. 169:

Admit that as of July 1, 2007, Atom accommodated and did not interfere with "standard technical measures" as defined in 17 U.S.C. §§ 512(i)(1)(B) and 512(i)(2).

Admit.

REQUEST FOR ADMISSION NO. 170:

Admit that ifilm.com has "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C. § 512(c)(2).

Admit.

REQUEST FOR ADMISSION NO. 171:

Admit that ifilm.com has provided to the Copyright Office substantially the information set forth in 17 U.S.C. § 512(c)(2)(A)-(B) for its designated agent to received notifications of claimed infringement.

Admit.

REQUEST FOR ADMISSION NO. 172:

Admit that the Register of Copyrights' current directory of agents designated to receive notifications for claimed infringement includes an agent for ifilm.com designated by you.

Admit.

REQUEST FOR ADMISSION NO. 173:

Admit that ifilm.com has stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(1).

Viacom objects to this RFA on the ground that it is vague with respect to the scope of the activity referenced. Subject to and without waiving that objection, deny.

REQUEST FOR ADMISSION NO. 174:

Admit that ifilm.com is a "service provider" as defined in 17 U.S.C. § 512(k)(1)(B).

Deny.

REQUEST FOR ADMISSION NO. 175:

Admit that ifilm.com has received DMCA Takedown Notices with respect to material posted on ifilm.com.

Viacom admits that ifilm.com has received a small number of takedown notices alleging copyright infringement with respect to material posted on ifilm.com.

REQUEST FOR ADMISSION NO. 176:

Admit that on every occasion that ifilm.com received a DMCA Takedown Notice, it responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the allegedly infringing material.

Admit.

REQUEST FOR ADMISSION NO. 177:

Admit that prior to receiving a DMCA Takedown Notice concerning user-uploaded material on ifilm.com, ifilm.com did "not have actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(c)(1)(A)(i).

Admit.

REQUEST FOR ADMISSION NO. 178:

Admit that prior to receiving a DMCA Takedown Notice concerning user-uploaded material posted on ifilm.com, ifilm.com was not aware of facts or circumstances from which infringing activity was apparent, as described in 17 U.S.C. § 512(c)(1)(A)(ii).

Admit.

REQUEST FOR ADMISSION NO. 179:

Admit that with respect to user-uploaded material posted on ifilm.com for which ifilm.com has received a DMCA Takedown Notice, ifilm.com does not have the right and ability to control the infringing activity, as described in 17 U.S.C. § 512(c)(1)(B).

Deny.

REQUEST FOR ADMISSION NO. 180:

Admit that with respect to user-uploaded material posted on ifilm.com for which ifilm.com has received a DMCA Takedown Notice, ifilm.com did not receive a financial benefit directly attributable to the infringing activity, as described in 17 U.S.C. § 512(c)(1)(B).

Viacom does not have enough information to determine whether alleged infringing clips on ifilm.com were a draw for users, and therefore does not have information sufficient to admit or deny.

REQUEST FOR ADMISSION NO. 181:

Admit that ifilm.com has adopted and reasonably implemented, and informs subscribers and account holders of ifilm.com of, a policy that provides for the termination in appropriate circumstances of its subscribers and account holders who are repeat infringers, as described in 17 U.S.C. § 512(i)(1)(A).

Deny.

REQUEST FOR ADMISSION NO. 182:

Admit that ifilm.com accommodates and does not interfere with "standard technical measures" as defined in 17 U.S.C. §§ 5l2(i)(l)(B) and 512(i)(2).

Deny.

REQUEST FOR ADMISSION NO. 183:

Admit that flux.com has "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C. § 512(c)(2).

Admit.

REQUEST FOR ADMISSION NO. 184:

Admit that flux.com has provided to the Copyright Office substantially the information set forth in 17 U.S.C. § 512(c)(2)(A)-(B) for its designated agent to received notifications of claimed infringement.

Admit.

REQUEST FOR ADMISSION NO. 185:

Admit that the Register of Copyrights' current directory of agents designated to receive notifications for claimed infringement includes an agent for flux.com designated by you.

Admit.

REQUEST FOR ADMISSION NO. 186:

Admit that flux.com has stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(c)(1).

Viacom objects to this RFA on the ground that it is vague with respect to the scope of the activity referenced. Subject to and without waiving that objection, deny.

REQUEST FOR ADMISSION NO. 187:

Admit that flux.com is a "service provider" as defined in 17 U.S.C. § 512(k)(1)(B).

Admit.

REQUEST FOR ADMISSION NO. 188:

Admit that flux.com has received DMCA Takedown Notices with respect to material posted on flux.com.

Deny.

REQUEST FOR ADMISSION NO. 189:

Admit that on every occasion that flux.com received a DMCA Takedown Notice, it responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the allegedly infringing material.

Deny.

REQUEST FOR ADMISSION NO.190:

Admit that prior to receiving a DMCA Takedown Notice concerning user-uploaded material on flux.com, flux.com did "not have actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(c)(1)(A)(i).

Deny.

REQUEST FOR ADMISSION NO. 191:

Admit that prior to receiving a DMCA Takedown Notice concerning user-uploaded material posted on flux.com, flux.com was not aware of facts or circumstances from which infringing activity was apparent, as described in 17 U.S.C. § 512(c)(l)(A)(ii).

Deny.

REQUEST FOR ADMISSION NO. 192:

Admit that with respect to user-uploaded material posted on flux.com for which flux.com has received a DMCA Takedown Notice, flux.com does not have the right and ability to control the infringing activity, as described in 17 U.S.C. § 512(c)(1)(B).

Deny.

REQUEST FOR ADMISSION NO. 193:

Admit that with respect to user-uploaded material posted on flux.com for which flux.com has received a DMCA Takedown Notice, flux.com did not receive a financial

benefit directly attributable to the infringing activity, as described in 17 U.S.C. § 512(c)(l)(B).

Deny.

REQUEST FOR ADMISSION NO. 194:

Admit that flux.com has adopted and reasonably implemented, and informs subscribers and account holders of flux.com of, a policy that provides for the termination in appropriate circumstances of its subscribers and account holders who are repeat infringers, as described in 17 U.S.C. § 512(i)(l)(A).

Deny.

REQUEST FOR ADMISSION NO. 195:

Admit that flux.com accommodates and does not interfere with "standard technical measures" as defined in 17 U.S.C. §§ 512(i)(1)(B) and 512(i)(2).

Deny.

REQUEST FOR ADMISSION NO. 196:

Admit that spiketv.com has "designated an agent to receive notifications of claimed infringement" as set forth in 17 U.S.C. § 512(c)(2).

Admit.

REQUEST FOR ADMISSION NO. 197:

Admit that spiketv.com has provided to the Copyright Office substantially the information set forth in 17 U.S.C. § 512(c)(2)(A)-(B) for its designated agent to receive notifications of claimed infringement.

Admit.

REQUEST FOR ADMISSION NO. 198:

Admit that the Register of Copyrights' current directory of agents designated to receive notifications for claimed infringement includes an agent for spiketv.com designated by you.

Admit.

REQUEST FOR ADMISSION NO. 199:

Admit that spiketv.com has stored material "at the direction of a user" as that phrase is used in 17 U.S.C. § 512(e)(1).

Viacom objects to this RFA on the ground that it is vague with respect to the scope of the activity referenced. Subject to and without waiving that objection, deny.

REQUEST FOR ADMISSION NO. 200:

Admit that spiketv.com is a "service provider" as defined in 17 U.S.C. § 512(k)(1)(8).

Admit.

REQUEST FOR ADMISSION NO. 201:

Admit that spiketv.com has received DMCA Takedown Notices with respect to material posted on spiketv.com.

Viacom admits that spiketv.com has received a small number of DMCA Takedown Notices with respect to material posted on spiketv.com.

REQUEST FOR ADMISSION NO. 202:

Admit that on every occasion that spiketv.com received a DMCA Takedown Notice, it responded "expeditiously," as that phrase is used in 17 U.S.C. § 512(c)(1)(A)(iii), to remove or disable access to the allegedly infringing material.

Admit.

REQUEST FOR ADMISSION NO. 203:

Admit that prior to receiving a DMCA Takedown Notice concerning user-uploaded material on spiketv.com, spiketv.com did "not have actual knowledge" that the material was infringing, as described in 17 U.S.C. § 512(c)(1)(A)(1).

Admit.

REQUEST FOR ADMISSION NO. 204:

Admit that prior to receiving a DMCA Takedown Notice concerning user-uploaded material posted on spiketv.com, spiketv.com was not aware of facts or circumstances from which infringing activity was apparent, as described in 17 U.S.C. § 512(c)(1)(A)(ii).

Admit.

REQUEST FOR ADMISSION NO. 205:

Admit that with respect to user-uploaded material posted on spiketv.com for which spiketv.com has received a DMCA Takedown Notice, spiketv.com does not have the right and ability to control the infringing activity, as described in 17 U.S.C. § 512(e)(1)(B).

Deny.

REQUEST FOR ADMISSION NO. 206:

Admit that with respect to user-uploaded material posted on spiketv.com for which spiketv.com has received a DMCA Takedown Notice, spiketv.com did not receive a financial benefit directly attributable to the infringing activity, as described in 17 U.S.C. § 512(c)(l)(B).

Viacom does not have enough information to determine whether alleged infringing clips on Atom were a draw for users, and therefore does not have information sufficient to admit or deny.

REQUEST FOR ADMISSION NO. 207:

Admit that spiketv.com has adopted and reasonably implemented, and informs subscribers and account holders of spiketv.com of, a policy that provides for the termination in appropriate circumstances of its subscribers and account holders who are repeat infringers, as described in 17 U.S.C. § 512(i)(1)(A).

Admit.

REQUEST FOR ADMISSION NO. 208:

Admit that spiketv.com accommodates and does not interfere with "standard technical measures" as defined in 17 U.S.C. §§ 512(i)(1)(B) and 512(i)(2).

Admit.

REQUEST FOR ADMISSION NO. 209:

Admit that when the Atom online video service was first launched, Atom sought to induce copyright infringement by failing to include content filtering technology, including without limitation content filtering technologies offered by Audible Magic Corporation, as part of its service.

Deny.

REQUEST FOR ADMISSION NO. 210:

Admit that Viacom sought to capitalize on a library of infringing video clips by acquiring the Atom online video service offered on addictingclips.com with knowledge that Atom was not using content filtering technology, including without limitation content filtering technologies offered by Audible Magic Corporation, as part of its service.

Deny.

REQUEST FOR ADMISSION NO. 211:

Admit that the escrow provision in the August 9, 2006 acquisition agreement between Atom Entertainment, Inc. and Viacom was included because Viacom was aware

of, and believed Atom to be liable for, prior copyright infringement committed by Atom's users.

Deny.

REQUEST FOR ADMISSION NO. 212:

Admit that Viacom's failure to use content filtering technology, including without limitation content filtering technologies offered by Audible Magic Corporation, as part of the online video services provided by Viacom UGC Sites is evidence of Viacom's desire to profit from infringing content.

Deny.

REQUEST FOR ADMISSION NO. 213:

Admit that, contrary to Your allegations, the operation of the YouTube service has increased "the incentives of America's creative industries."

Deny.

Respectfully submitted,

January 8, 2010

Susan J. Kohlmann /jcc

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 8th day of January 2010, on Defendants' counsel by electronic mail pursuant to an agreement of the parties under Fed. R. Civ. P. 5(b)(2)(D).

James C. Cox

Attachment A

Named Plaintiff	Video ID
VIACOM INTERNATIONAL	_4J1nPR9obI
VIACOM INTERNATIONAL	_KDSYA5bEMc
VIACOM INTERNATIONAL	_yr3Fu_LRE4
VIACOM INTERNATIONAL	0ZO5f4q8b-g
PARAMOUNT PICTURES	17kAJR7YbDE
VIACOM INTERNATIONAL	1dWtA-nK-sQ
COMEDY PARTNERS	1LOjvymWwvI
COMEDY PARTNERS	29le85Vp8vI
VIACOM INTERNATIONAL	2TncoW-J6wA
PARAMOUNT PICTURES	3US2k6mTtEw
PARAMOUNT PICTURES	3wo2FcjFP98
COMEDY PARTNERS	4nLoXLBwZv0
COMEDY PARTNERS	5Esm9Mlt5Xo
COMEDY PARTNERS	5gbI2_Kocug
COMEDY PARTNERS	5Hd_JzIl1MA
VIACOM INTERNATIONAL	5tvtDQVpq_o
VIACOM INTERNATIONAL	6_SaSuqfGB4
VIACOM INTERNATIONAL	6WhsXvOe2IU
VIACOM INTERNATIONAL	744Gh8MbTWg
VIACOM INTERNATIONAL	7aGjJBalKgs
COMEDY PARTNERS	83KsT9D_6aI
VIACOM INTERNATIONAL	88XvlfKnGwI
COMEDY PARTNERS	8AYnfxZ_BXI
COMEDY PARTNERS	8v8vhNKIAZ4
PARAMOUNT PICTURES	-9_Nrpc8noE
PARAMOUNT PICTURES	a_kdq0V9G3Y
COMEDY PARTNERS	aITz05jvTlk
VIACOM INTERNATIONAL	AjG9o33dQRQ
VIACOM INTERNATIONAL	aUonqu5RIcM
PARAMOUNT PICTURES	B64MeRiGDYo
VIACOM INTERNATIONAL	b8kFrT6Ni08
VIACOM INTERNATIONAL	BbWi_RN9ou8
COMEDY PARTNERS	bdRNAUTDBqY
COMEDY PARTNERS	BrCI7t5SU-s
PARAMOUNT PICTURES	C2kSoDWG404
VIACOM INTERNATIONAL	cjhmH21ed-c
PARAMOUNT PICTURES	cpC6E1yLTx8
COMEDY PARTNERS	cR5BCbGyTkc
VIACOM INTERNATIONAL	CSs79sYQ1_o
PARAMOUNT PICTURES	cuDlQ_dIsyA
COMEDY PARTNERS	CxVxzXCbeOw
PARAMOUNT PICTURES	czg16nOL_Jc
VIACOM INTERNATIONAL	dMNgKJsmHwo
COMEDY PARTNERS	eGXV-oXzzUE
PARAMOUNT PICTURES	eRR_IDApRQs
COMEDY PARTNERS	FDXmujT4MZE
COMEDY PARTNERS	F-vuYx6d1XM
VIACOM INTERNATIONAL	g0nOEudbKOQ
VIACOM INTERNATIONAL	GgcxPrquS2k
PARAMOUNT PICTURES	H0AQehIKRB4
PARAMOUNT PICTURES	H0ZLZTR-g5Y

Named Plaintiff	Video ID
COMEDY PARTNERS	Hgu1RM2vbVM
COMEDY PARTNERS	hhXlVDxYzvg
VIACOM INTERNATIONAL	HM4b0wcMo_0
VIACOM INTERNATIONAL	hnKQ7xzDjQ4
COMEDY PARTNERS	hSdMtP8qztA
PARAMOUNT PICTURES	hZYpL6Vdz4k
PARAMOUNT PICTURES	i3YBKlAXvvk
VIACOM INTERNATIONAL	I4pc-6V4IZc
VIACOM INTERNATIONAL	i55f6qUSq4A
COMEDY PARTNERS	IZdKpTkQv8g
VIACOM INTERNATIONAL	J_LMd1WMyk4
VIACOM INTERNATIONAL	jD9iQbQBHiI
VIACOM INTERNATIONAL	jP_AXwoCgws
PARAMOUNT PICTURES	JZwFUe2aXLA
VIACOM INTERNATIONAL	K4sS0wA_-lA
VIACOM INTERNATIONAL	k6CSyIS5528
PARAMOUNT PICTURES	KcU0ye3nXtA
VIACOM INTERNATIONAL	kgyL9-VnhoU
COMEDY PARTNERS	KhIPvn26b1A
PARAMOUNT PICTURES	KiBDCZX7HQc
PARAMOUNT PICTURES	KNeaHNwwvvM
VIACOM INTERNATIONAL	kpkmya7Mkzk
PARAMOUNT PICTURES	kvEeLZV1j-k
COMEDY PARTNERS	L6a_iKo83RE
COMEDY PARTNERS	L8GYvvm_3bE
VIACOM INTERNATIONAL	L9h0BpdVMxA
VIACOM INTERNATIONAL	lirJJlViWsE
PARAMOUNT PICTURES	lvb3QDrHxRA
VIACOM INTERNATIONAL	L-VLn6bEOvs
VIACOM INTERNATIONAL	LYGpcUofXbk
COMEDY PARTNERS	lz0JZvlMrOA
VIACOM INTERNATIONAL	LzIoLR5i9uw
PARAMOUNT PICTURES	meXedwbvCh8
VIACOM INTERNATIONAL	MGZbVuVW2wQ
PARAMOUNT PICTURES	mJkGJQyDNQ0
VIACOM INTERNATIONAL	mk3uiuXo4dk
PARAMOUNT PICTURES	mOvZn9ebc8Q
PARAMOUNT PICTURES	MSGNvmqcZK0
VIACOM INTERNATIONAL	mTLMUWP13pE
VIACOM INTERNATIONAL	MV9EB2EXGdk
COMEDY PARTNERS	N0QCkXfxJs4
COMEDY PARTNERS	N-4MT9u6LUs
VIACOM INTERNATIONAL	N7Q-vFtW8Lk
VIACOM INTERNATIONAL	n8wDRoQkN1c
VIACOM INTERNATIONAL	nCHY88De2A0
COMEDY PARTNERS	NdpArPebjFY
COMEDY PARTNERS	neyj1SyVjBs
VIACOM INTERNATIONAL	Nr8fA2kX44E
COMEDY PARTNERS	nyLj0T9EKAo
VIACOM INTERNATIONAL	nZ3SdIb5NDI
PARAMOUNT PICTURES	o8pkZ38bLvU

Named Plaintiff	Video ID
VIACOM INTERNATIONAL	oQUgal6CFSI
PARAMOUNT PICTURES	OUWSSmNxArs
COMEDY PARTNERS	p1i1wcUpTbU
COMEDY PARTNERS	Pa3J-L29iT8
PARAMOUNT PICTURES	paveBpTiNqI
COMEDY PARTNERS	pBHnokTr1xg
COMEDY PARTNERS	pE2MiujT7Yg
VIACOM INTERNATIONAL	Phap3WkYOpc
VIACOM INTERNATIONAL	pIGQYawzv9c
COMEDY PARTNERS	Ppm3MIsqsK4
VIACOM INTERNATIONAL	PReDb3aDGDg
COMEDY PARTNERS	PuqX26-GCWY
COMEDY PARTNERS	Pvz66FuaHso
COMEDY PARTNERS	pyP1JFa8bJc
COMEDY PARTNERS	qFXAl0IQiM4
COMEDY PARTNERS	QrROfhjqpDs
COMEDY PARTNERS	Q-VvGxYDGm0
VIACOM INTERNATIONAL	r_c6WIbOG2M
COMEDY PARTNERS	r0WZATT9P9g
VIACOM INTERNATIONAL	rDOB6g2-3FU
COMEDY PARTNERS	rf3BHTB2RAY
PARAMOUNT PICTURES	RhNehWcBADg
VIACOM INTERNATIONAL	rkQ9C-9pWJg
COMEDY PARTNERS	RRrB_hitU-c
COMEDY PARTNERS	s0e_IfSMtlI
COMEDY PARTNERS	S5pUWE1WGKw
VIACOM INTERNATIONAL	s8VLwpyYtB0
COMEDY PARTNERS	sIXfcdZbnUw
VIACOM INTERNATIONAL	SwyufkyHfyU
VIACOM INTERNATIONAL	T3ysjszEu1s
PARAMOUNT PICTURES	tbU_2WGlqkU
VIACOM INTERNATIONAL	TZv0POyzkpc
COMEDY PARTNERS	uJg2geqHK5U
COMEDY PARTNERS	USds5DhScmg
VIACOM INTERNATIONAL	Ux6aFYuTYNY
VIACOM INTERNATIONAL	UXmn2TS_ALQ
VIACOM INTERNATIONAL	v0uIAyq4p2o
PARAMOUNT PICTURES	v5XPki6Nj6k
COMEDY PARTNERS	VbDA1XS6M6A
COMEDY PARTNERS	Vj9rdT-t8Lc
VIACOM INTERNATIONAL	vlQhux5mXfY
COMEDY PARTNERS	vNgoUewhYTM
COMEDY PARTNERS	w-0x-Pwtbtw
COMEDY PARTNERS	w4ONAjIFmJY
VIACOM INTERNATIONAL	WBxZLCDm2uo
COMEDY PARTNERS	wfWEjb3DtV0
VIACOM INTERNATIONAL	WLZfSH3j_Zg
VIACOM INTERNATIONAL	wMHpbGDIddE
COMEDY PARTNERS	Wqq-lfH3NNc
COMEDY PARTNERS	wxhRkff16ys
COMEDY PARTNERS	X-8UmL4lpPI

Named Plaintiff	Video ID
VIACOM INTERNATIONAL	xbrJOliv0qE
PARAMOUNT PICTURES	xHVqXaC-NIA
COMEDY PARTNERS	xiFajP-KVzE
PARAMOUNT PICTURES	xmHsafia5jE
COMEDY PARTNERS	Xo9TWFRIUN8
COMEDY PARTNERS	YbCNhLX-mi8
COMEDY PARTNERS	yVUAvM3fvXQ
PARAMOUNT PICTURES	ZpVZoLTAiKY

Rubin Exhibit 88

From: Vicky Fang <Vicky.Fang@mtvnmix.com>
Date: Wed, 05 Jul 2006 09:59:39 -0400
To: "Bos, Chris" <Chris.Bos@spiketv.com>, Steve Farrell <Steve.Farrell@spiketv.com>
Subject: Re: You tube

I have a phone meeting with the guy today (there's an approval process involved) -- I think it's probably a good idea to go the official route, but we can also go both routes, as many places do. More on that soon... We should probably set up some standards as far as URL overlay/slating for these videos. Also... Do we have an outlet to send these out once we post on You Tube?
-Vicky

On 6/30/06 9:42 PM, "Bos, Chris" <Chris.Bos@spiketv.com> wrote:

Hey,

Did you sign up for the "official" director account so we can get the spike logo and link to the show page in the description? At the moment we have have a non hyperlink in place which won't be doing much for our google awareness.

-----Original Message-----
From: Fang, Vicky
Sent: Fri 6/30/2006 6:07 PM
To: Farrell, Steve
Cc: Bunyi, Martin; Chung, Min; Bos, Chris; Kondas, Jeff; Kondas, Brian; Vecsi, Dayna; Farrell, Vincent; Parouka, Karmelina; Abrams, Mike; Whittingham, Chris; Klein, Melanie

Subject: You tube

Ok, I am uploading you tube videos under the fake grassroots account "demansr" -- am having a phone conversation with the You Tube people on Wednesday as they already are questioning my identity. Bastards.

ROOFS
I love you tammy
http://www.youtube.com/watch?v=T5ELL0pV0BM

Father son crapper moment
http://www.youtube.com/watch?v=Fl5zRNFzmIo

DUDESONS
Baseball bat surprise
http://www.youtube.com/watch?v=-mcsQarma04

So anyhow, don't sue me. Steve, do you want to tell Matt about this?

-Vicky

Rubin Exhibit 89

Subject: RE: youtube: mtv2 "official partner" ???
From: "Exarhos, Tina" <EX:/O=VIACOM/OU=MTVUSA/CN=RECIPIENTS/CN=EXAROST
>
To: Cohn, David
Cc: Date: Fri, 03 Mar 2006 03:53:07 +0000

Jason.

From: Cohn, David
Sent: Thu 3/2/2006 10:50 PM
To: Exarhos, Tina
Subject: Re: youtube: mtv2 "official partner" ???

Who you disagreeing with?

Sent from my BlackBerry Wireless Handheld

-----Original Message-----
From: Exarhos, Tina
To: Cohn, David
Sent: Thu Mar 02 22:44:42 2006
Subject: RE: youtube: mtv2 "official partner" ???

Hmmm. I really disagree. My presentation at Bacara will detail. Ubiquity in upfront promotion is a necessity.

From: Cohn, David
Sent: Thu 3/2/2006 4:48 PM
To: Exarhos, Tina
Subject: FW: youtube: mtv2 "official partner" ???

interesting....se below

-----Original Message-----
From: Hirschhorn, Jason
Sent: Thursday, March 02, 2006 4:43 PM
To: Cohn, David
Cc: White, Ben
Subject: RE: youtube: mtv2 "official partner" ???

I guess my take is ifilm should get better stuff or a bit more if possible given they are a sister company. People are pitting the 2 in the press, and we don't want a bad story written that we don't not trying to build our own asset, not your issue. Just asking...

If a reporter saw some sort of official partner thing on you tube and wanted to go there on ifilm not ebing at same level, you get me, yes?

-----Original Message-----
From: Cohn, David
Sent: Thursday, March 02, 2006 4:39 PM
To: Hirschhorn, Jason
Cc: White, Ben
Subject: RE: youtube: mtv2 "official partner" ???

I get it. Just not sure how aggresively we want to be in stopping them, when at the end of the day, it's a meaningless term as long as ifilm has the same access, and usually better

-----Original Message-----
From: Hirschhorn, Jason
Sent: Thursday, March 02, 2006 4:37 PM
To: Cohn, David
Cc: White, Ben
Subject: RE: youtube: mtv2 "official partner" ???

Please contact blair, and I don't like youtube calling mtv2 official. Think it hurts morale of ifilm. I get you guys needing to be everywhere. But slight favor to ifilm helps us build a biz.

-----Original Message-----
From: Cohn, David
Sent: Thursday, March 02, 2006 4:34 PM
To: Hirschhorn, Jason
Cc: White, Ben
Subject: RE: youtube: mtv2 "official partner" ???

Been servicing clips of andy & wonder all over the place...it's the central component in marketing these shows (I think the kids call it "viral marketing"). But nothing "official" about it; what I got back from my mktg folks:

There is no sponsorship implication nor any contractual obligations. There is no deal... They use it very loosely. It is just a label to provide additional value, i.e. calling out MTV2, homepage promotion, and providing link back to MTV2.com. (They secured the "MTV2" user name for us to upload videos).

Happy to communicate directly with blair if you want. Thrilled with the exposure we've been getting on ifilm (andy, wonder, wildboyz 3,4,5 in most viewed tv shows last I checked), but I think we've got to be everywhere

Call if you'd like to discuss

-----Original Message-----
From: Hirschhorn, Jason
Sent: Thursday, March 02, 2006 2:22 PM
To: Cohn, David
Cc: White, Ben
Subject: FW: youtube: mtv2 "official partner" ???

??????

-----Original Message-----
From: Blair Harrison [mailto:bharrison@ifilm.com]
Sent: Thu Mar 02 14:20:47 2006
To: Hirschhorn, Jason
Subject: FW: youtube: mtv2 "official partner" ???

Do you know anything about this?

From: Frank Voci
Sent: Thursday, March 02, 2006 10:50 AM
To: Blair Harrison
Subject: youtube: mtv2 "official partner" ???

Check out:

http://youtube.com/watch?v=YHYW6GLCcyQ

see Official Partner badge at top of right column.

Now they are squarely in our sandbox.

--frank.

Rubin Exhibit 90

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION LLC,	)	
Plaintiffs,	)	
vs.	) Case No.	) 1:07CV02103
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,	)	
Defendants.	)	

VIDEOTAPED DEPOSITION OF JEFFREY CASTANEDA

New York, New York

Tuesday, September 29th, 2009

REPORTED BY:

ERICA RUGGIERI, CSR, RPR

JOB NO: 17745

CASTANEDA

A. Mid-'90s.

Q. And you don't recall using it after the mid-'90s?

09:49:01 A. I don't recall.

Q. Mr. Castaneda, have you ever created any YouTube accounts?

A. Yes.

Q. Okay. Which ones?

09:49:11 A. I have one YouTube account under the user name mosjef73.

Q. Can you spell that user name?

A. Sure. M-O-S-J-E-F 73.

Q. Have you ever created any other

09:49:31 YouTube accounts?

A. No.

Q. Have you ever uploaded videos to YouTube?

A. Yes.

09:49:37 Q. Okay. And using what accounts have you uploaded videos to YouTube?

A. Mosjef73.

Q. Any others?

A. No.

09:49:50 Q. Are you familiar with a YouTube

account with the user name MTV2?

A. Vaguely.

Q. Do you know the password to the

09:50:04 MTV2 YouTube account?

A. I do not.

Q. Have you ever uploaded any videos to the MTV2 YouTube account?

A. No.

09:50:13 Q. Have you ever logged onto -- excuse me. Have you ever accessed the YouTube website to see videos listed under the MTV2 account?

A. Not that I can recall.

09:50:36 Q. So let's talk about mosjef73.

You said that you uploaded videos to that account. What videos?

A. The videos I uploaded to my mosjef73 account were two clips, one of

09:50:54 which was for an MTV show called Andy Milonakis. And the other clip was a clip from MTV2 called Wonder Showzen.

Q. At any point in time have you ever uploaded any clips, using the

09:51:18 mosjef73 account, other than the account

you just named?

A. Can you repeat the question.

Q. At any point in time have you

09:51:25 ever uploaded any clips to the mosjef73 account, other than the two clips that you just mentioned?

A. No.

Q. Okay. When you uploaded the two

09:51:36 clips, the one for Andy Milonakis and the one for Wonder Showzen, were you doing that within your capacity as an MTV2 employee?

A. Yes.

09:51:46 Q. Did anyone else upload clips to the mosjef73 YouTube account?

A. Did anyone else?

Q. Uh-hum.

A. No.

09:51:58 Q. Did anyone else have the password to that account?

A. No.

Q. Did anyone else have any other means to access that account?

09:52:08 A. No.

CASTANEDA

Q. Okay. The two clips that you uploaded using mosjef73, those videos were authorized to be on YouTube by MTV2?

09:52:22 A. Yes. Those two clips were authorized by MTV2.

Q. And what was your purpose in uploading those clips?

A. My purpose in uploading those

09:52:38 clips was, as part of a larger price campaign, we sent out a, those clips, those two specific clips, to a number of sites to promote the shows, Andy Milonakis and Wonder Showzen. And there were two

09:53:05 clips that were selected by the marketing department and the producers at MTV2?

Q. And when you say they were sent to a number of sites, that included YouTube.com, right?

09:53:16 A. That is correct.

Q. And the purpose in uploading those clips to YouTube.com was to promote the underlying shows, right?

A. The purpose of sending those

09:53:31 clips to a variety of different websites

Rubin Exhibit 91

From: Castaneda, Jeff <Jeff.Castaneda@mtvstaff.com>
Date: Tue, 21 Feb 2006 16:42:30 -0500
To: Cohn, David <David.Cohn@mtvn.com>, Eng, Carol <Carol.Eng@mtvstaff.com>, Preston, Lisa <Lisa.Preston@mtvstaff.com>, Healy, Tim <Tim.Healy@mtvstaff.com>, DeBenedittis, Paul A. <PaulA.-Schedule.DeBenedittis@mtvstaff.com>, Lam, Cuong <Cuong.Lam@mtvstaff.com>, Campbell, Timothy <Timothy.Campbell@mtvn.com>, DiSanto, Tony <Tony.DiSanto@mtvstaff.com>, James, Graham - MTV <Graham.James@mtvstaff.com>, Dix, Michele <Michele.Dix@mtvstaff.com>, Ignjatovic, Jesse <Jesse.Ignjatovic@mtvstaff.com>, Calderone, Tom <Tom.Calderone@vh1staff.com>
Subject: WS and Andy M clips online

Dear all -

Just a heads up - the Wonder Showzen and Andy Milonakis clips are beginning to pop up online. Will send around more links as I get them.

Wonder Showzen clips

http://www.doubleviking.com/

http://www.youtube.com/watch?v=lvA6oabsA_E

Andy Milonakis clips

http://www.youtube.com/watch?v=x-Igybtxczk

Thanks
jeff

Jeff Castaneda
MTV2 / MTV HITS / MTV JAMS / MTV Communications
212-846-6774
jeff.castaneda@mtvstaff.com
IM: MosJef73

Rubin Exhibit 92

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mosjef73's Channel Subscribe All Uploads Favorites

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Flavor Unit Mcs Roll wit tha flava

7 ratings ★★★★★

From: pauloeufrasio | January 27, 2009 | 2,458 views

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This Womans Work Live
jtloco2525 - 680,983 views

Noel Gallagher Wonderwall
totalfree... - 322,724 views

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mosjef73
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Subscribers (2)

hunterpec...

AbbyDLaughs

Profile

Channel Views:	213
Total Upload Views:	0
Age:	36
Joined:	February 16, 2006
Last Sign In:	6 hours ago
Subscribers:	2

Channel Comments

There are no comments for this user.

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mosjef73 subscribed to jayz
(2 weeks ago)

mosjef73 favorited a video
(3 weeks ago)

Flavor Unit Mcs Roll wit ...

mosjef73 subscribed to alfredoearle (3 weeks ago)

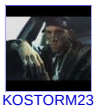
mosjef73 subscribed to AbbyDLaughs (1 month ago)

mosjef73 subscribed to ABSCBNOnline (1 month ago)

Subscriptions (19)

hiphoprox

stillhe...


KOSTORM23

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Rubin Exhibit 93

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There are no comments for this user.

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Channel Views:	238
Total Upload Views:	0
Age:	29
Joined:	April 10, 2006
Last Sign In:	3 years ago
Subscribers:	0
Country:	United States

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There hasn't been any recent activity.

Rubin Exhibit 94

MTVSneakAttack's Channel Subscribe MTVSneakAttack has no videos available.

MTVSneakAttack

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Profile

Channel Views:	835
Total Upload Views:	0
Age:	29
Joined:	April 21, 2006
Last Sign In:	3 years ago
Subscribers:	9
Country:	United States

Recent Activity

There hasn't been any recent activity.

Subscribers (9)

iaminfa jleao nigoape stillcool... jordan230... banjBILLIONS infinitvs... yaboy212 b0b9o

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There are no comments for this user.

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